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*Attorneys for Defendants Meta Platforms, Inc.,
Mark Zuckerberg, David Wehner, and Sheryl Sandberg
[Additional Counsel on Signature Page]*

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

PLUMBERS AND STEAMFITTERS
LOCAL 60 PENSION TRUST, Individually
and on Behalf of All Others Similarly
Situated,

Plaintiffs,

v.

META PLATFORMS, INC., MARK
ZUCKERBERG, DAVID WEHNER, and
SHERYL SANDBERG,

Defendants.

Case No. 4:22-cv-01470-YGR

**STIPULATION AND [PROPOSED]
ORDER CONTINUING HEARING
ON DEFENDANTS' MOTION TO
DISMISS**

Hon. Yvonne Gonzalez Rogers

1 Defendants Meta Platforms, Inc., (“Meta”), Mark Zuckerberg, David Wehner, and Sheryl
 2 Sandberg (“Individual Defendants” and together with Meta collectively “Defendants”), Lead
 3 Plaintiffs Menora Mivtachim Insurance Ltd., Menora Mivtachim Pension and Gemel Ltd., The
 4 Phoenix Insurance Company, Ltd., and The Phoenix Provident Pension Fund Ltd. (“Lead
 5 Plaintiffs”) by and through their undersigned counsel, hereby stipulate and agree as follows and
 6 jointly request that the Court enter the below Order approving this Stipulation.

7 **WHEREAS**, on August 24, 2022, the Court set the briefing schedule on Defendants’
 8 Motion to Dismiss the Amended Complaint (Dkt. 58);

9 **WHEREAS**, on October 18, 2022, Defendants filed their Motion to Dismiss the Amended
 10 Complaint, which set oral argument for February 28, 2023 (Dkt. 61);

11 **WHEREAS**, on December 30, 2022, Plaintiffs filed their Opposition to Defendants’
 12 Motion to Dismiss the Amended Complaint (Dkt. 65);

13 **WHEREAS**, on February 14, 2023, Defendants’ Reply in Support of their Motion to
 14 Dismiss the Amended Complaint is due;

15 **WHEREAS**, on January 30, 2023, lead counsel for Defendants began a jury trial before
 16 Judge Masley in the Commercial Division of the New York State Supreme Court, which is running
 17 longer than anticipated and is now expected to close on February 24, 2023;

18 **WHEREAS**, given lead counsel’s month-long trial immediately preceding the current
 19 hearing date, and the uncertainties of when the trial and jury deliberations will actually conclude,
 20 counsel for Defendants have met and conferred with counsel for Lead Plaintiffs, and both parties
 21 agreed that a request to continue the hearing is warranted;

22 **WHEREAS**, counsel for Defendants and counsel for Lead Plaintiffs respectfully submit
 23 that good cause exists to continue the scheduled February 28, 2023, hearing on Defendants’
 24 Motion to Dismiss to Tuesday, March 21, 2023, at 2:00 p.m.

25 **IT IS ACCORDINGLY STIPULATED**, by and between the undersigned counsel for Lead
 26 Plaintiffs and Defendants, that:

27 1. The February 28, 2023 hearing on Defendants’ Motion to Dismiss the Amended
 28 Complaint is continued to Tuesday, March 21, 2023 at 2:00 p.m.

1 DATED: February 13, 2023

LATHAM & WATKINS LLP

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19 *Attorneys for Defendants Meta Platforms, Inc.,*
20 *Mark Zuckerberg, David Wehner, and Sheryl*
21 *Sandberg*

22 DATED: February 13, 2023

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PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: _____

Hon. Yvonne Gonzales Rogers
United States District Court Judge

SIGNATURE ATTESTATION

I am the ECF User whose identification and password are being used to file the foregoing Stipulation and [Proposed] Order Continuing Hearing on Defendants' Motion to Dismiss. Pursuant to L.R. 5-1(h)(3) regarding signatures, I, Andrew B. Clubok, attest that concurrence in the filing of this document has been obtained.

Dated: February 13, 2023

/s/ Andrew B. Clubok
Andrew B. Clubok